

**ENVIRONMENTAL PROTECTION AGENCY
NAVY -- SEMI-ANNUAL BRAC REPORT
October 1, 2010 – March 31, 2011**

NCBC DAVISVILLE, RI

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I. Significant Issues:

a. Congressional: None.

b. High Profile Items: None.

c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer:

Nike PR58 FUDS is one of the sources for OU7, the site 03 groundwater plume. As a follow-up to various technical meetings, the Army Corps of Engineers (ACOE) is investigating the area beyond where EPA's recently installed wells indicated the Nike plume was moving. The Nike Remedial Investigation (RI) was delayed until late spring 2011 due to ACOE contacting issues. A ROD may be delayed beyond 2012 for the Nike site pushing our OU7 ROD out further in order to incorporate the Army Corps of Engineers/Rhode Island Department of Environmental Management (ACOE/RIDEM) decision into our ROD (currently expected in FY 2012).

III. Staffing/Funding Issues: None.

IV. MOU Support Update:

EPA and Navy are cooperating in the remedy optimization investigation at OU8. EPA's field work from this past summer helped reduce Navy sampling locations in the offshore because we didn't find any contamination in the nearshore on the Narragansett Bay side of the site. Due to the contamination gradient EPA was able to provide, the Navy is now able to evaluate further offshore beyond our nearshore points in the Entrance Channel. EPA is also using Strategic Environmental Research and Development Program (SERDP) resources to determine contaminant flux at the source area and downgradient. Downgradient flux meters were recently retrieved and sent for analysis. Navy has just recently commenced their field work.

SOUTH WEYMOUTH NAVAL AIR STATION, MA

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I. Significant Issues:

a. Congressional: None.

b. High Profile Items: (See Section III also.) The Proposed Plan for the Area of Concern 55C - Wetland Area North of Trotter Road (OU22) was issued on April 11, 2011 and a public hearing was held on April 25, 2011. A ROD is planned for September 2011.

The removal action at the Main Gate Encroachment Area was completed. Approximately 2,500 tons of contaminated soils were excavated and transported off-site for disposal. Site restoration activities are underway. A Removal Action Completion report and Proposed Plan will be issued in June 2011 and July 2011, respectively. A ROD is planned for September 2011.

c. Delays in Environmental Restoration Activities: None.

II. Issues Impacting Transfer:

Perfluorinated compounds have been detected above health advisory levels in the groundwater at Hangar 1 and the former Fire Fighting Training Area. Additional soil, groundwater, surface water, and sediment investigations are underway to define the extent of contamination in these areas in accordance with the April 2011, "Final Sampling and Analysis Plan Addendum."

III. Staffing/Funding Issues: None.

IV. MOU Support Update:

EPA proposed the use of passive vapor diffusion samplers at the Solvent Release Area to help quantify indoor air risk where it is challenging, because of the high water table. EPA's laboratory has these capabilities.

NAVAL AIR STATION CECIL FIELD, FL

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DoD BEC:	Art Sanford	843-743-2135	Art.Sanford@navy.mil

I. Significant Issues:

a. Congressional: None.

b. High Profile Items: None.

c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer:

Identification of unexploded ordnance at OU5, Site 15 has prevented the transfer of Site 15. A Supplemental RI sampling and analysis plan for Munitions Response Program MEC was reviewed by EPA. Additional UXO surveys are underway.

III. Staffing/Funding Issues:

Greg Fraley, was the EPA RPM for Cecil Field from March 2010 until retirement in December 2010. Debbie Vaughn-Wright, who has been at the site since January 2011, is the new RPM for EPA.

IV. MOU Support Updates:

- Due to RPM retirement, Debbie Vaughn-Wright was assigned to NAS Cecil Field in January 2011. Ms. Vaughn-Wright was the RPM at Cecil Field from 1996 until 2002. Due to her knowledge of the site, the transition between EPA RPMs has been very smooth and facilitated continued progress.
- EPA has provided timely reviews of draft annual long term monitoring (LTM) reports for 2010 at 6 groundwater sites.
- Through partnering, EPA has been an effective member of the BCT and has engaged the team in discussions about improvements to ongoing remedial actions (Sites 36/37, Site 45 and Site 3). Changes discussed could shorten cleanup timeframes, involve green technologies and enhance the actions protecting human health and the environment.
- EPA participated in quarterly Land Use Control (LUC) inspections which included participation by the remaining RAB participant and the Jacksonville Airport Authority. This interaction strengthened the important role of the entire Cecil Field BCT in the LUC process.
- EPA has responded to requests made by the Navy on behalf of the Jacksonville Airport Authority (JAA) regarding renovation of flightline infrastructure down gradient of a groundwater plume. Prompt response enabled the Navy to provide guidance to the JAA on how to proceed. This illustrates how EPA, FDEP and the Navy working together keep abreast of issues which may come up at Cecil Field and how we can address them without costly delays.
- EPA completed its review of the third Five-Year Review and encouraged Florida to complete their review. The Five-Year Review has been finalized and is on track for agency approval.

NAVAL AIR STATION DALLAS, TX

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I. Significant Issues:

a. Congressional: None.

b. High Profile Items: The City of Dallas would like to complete a Ready for Reuse determination for their property. However, there is a disagreement with the Navy on the cleanup standards for the groundwater (residential) and on the potential indoor air intrusion from the TCE groundwater plumes located underneath several buildings that have been remodeled and recently occupied. These buildings have not been sampled. In the 2002 settlement agreement with the City of Dallas, the Navy agreed to a residential cleanup standard for all media. In January of 2009, the Navy submitted a remedy revision to TCEQ that would not require the cleanup of the groundwater to residential, but would only require periodic monitoring. In the summer of 2009, a meeting between the Navy, the City of Dallas, EPA, and TCEQ was held pertaining to the change in the cleanup standard for the groundwater but nothing was resolved at the meeting. Also, there is a TCE groundwater plume from the adjacent Naval Weapons Reserve Plant which has migrated onto NAS Dallas. The city has indicated that this plume must be cleaned up to residential standards; however, the Navy has indicated that just monitoring the plume is sufficient.

Since the summer meeting of 2009, there have been no meetings between the city and the Navy to resolve the issues discussed above. EPA has strongly encouraged the Navy to have meetings with the city to have these issues resolved. EPA has contacted the Navy several times; however, as of this date no meetings have been held.

c. Delays in Environmental Restoration Actions: The Navy has not performed indoor air sampling at four buildings overlying a TCE plume. Also, see II.b above.

II. Issues Impacting Transfer:

There are potential redevelopment issues for the City of Dallas due to disagreements with the Navy on the cleanup standards for the groundwater plumes and the lack of vapor intrusion sampling at newly occupied buildings overlying the TCE plumes. See item II.b. above.

III. Staffing/Funding Issues: None

IV. MOU Support Update:

Over the past year and half, EPA has provided the Navy with EPA's Indoor Air Sampling and Analysis Workplans, the Quality Assurance Project Plans, the Indoor Building materials checklist, the Region 6 Vapor Intrusion Policy and the Indoor Air Sampling results from a site (Delfasco) located within a quarter mile of the NAS Dallas site. EPA

has also been trying to persuade TCEQ for the past year to issue a letter to the Navy requiring indoor air sampling at approximately four occupied buildings. Most recently, the TCEQ project manager has indicated that they will issue a letter to the Navy requiring indoor air sampling.

HUNTERS POINT NAVAL SHIPYARD, CA

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I. Significant Issues:

- a. Congressional: None.
- b. High Profile Items: EPA continues to heavily support the Navy's community involvement program, having participated in most of the community interviews for the revised Community Involvement Plan that was released this period. EPA was pleased with the work the Navy put into the draft CIP, and has supported the Navy on multiple community meetings on the draft.
- c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer:

The city's negotiations with potential insurance carriers to support the Early Transfer have been slower than expected and may delay the Early Transfer date by several months.

III. Staffing/Funding Issues:

Sarah Kloss left EPA Region 9 (San Francisco) in late April 2011.

IV. MOU Support Updates:

EPA is still in the process of negotiating the Administrative Order on Consent that will essentially replace the FFA for the Early Transfer parcels. Several groundwater treatability studies for VOCs were successfully completed. Radiological screening at a fill area was completed and showed no risk at the surface.

The Bay Conservation and Development Commission raised issues concerning several remedial actions along the shoreline, with a request that the landfill Feasibility Study be re-written to evaluate beach restoration. EPA convinced the Commission that robust containment remedies are necessary and that beach restoration is not possible along landfill shorelines. This will allow the FS to go final without further delays.

LONG BEACH SHIPYARD, CA

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I. Significant Issues:

- a. Congressional: None.
- b. High Profile Items: Dredging at Site 7 Basin is completed.
- c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer: None.

III. Staffing/Funding Issues: None.

IV. MOU Support Update:

EPA continues to review all documents from the site. EPA also continues to provide corporate knowledge about the history of site remediation and agreements between regulators and Navy. RPM also provides guidance on requirements under CERCLA.

TUSTIN MARINE CORPS AIR STATION, CA

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I. Significant Issues:

- a. Congressional: None.
- b. High Profile Items: None.
- c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer: None.

III. Staffing/Funding Issues: None.

IV. MOU Support Update:

OU1A/OU1B Final 2009 Annual Performance Evaluation, Groundwater Remedy Report:
EPA successfully facilitated a potential impasse with the State of California (DTSC) regarding whether the Navy had demonstrated plume capture. A technical meeting was convened by the Navy, and EPA provided hydro geological and technical expertise that resulted in a BCT consensus, allowing the report to be finalized as scheduled. The expeditious resolution of this project task yielded a significant cost savings as additional field work was not required.

Draft OU1A/OU1B CERCLA Five-Year Review Process Plan:

At the request of the Navy, EPA facilitated a BCT resolution of a risk assessment concern raised by DTSC regarding: 1) exposure parameters for two buffer zones (Site 222) within a carve-out area (CO-5) overlying the 1,2,3-TCP contaminated plume; and 2) change in the toxicity criteria for 1,2,3-TCP since the 2003 OU1A ROD risk assessment. EPA and the Regional Water Quality Control Board independently reviewed data presented by DTSC and determined that the previously agreed-upon 2003 risk assessment was still valid. However, the resolution agreed to by the BCT noted that the DTSC risk issues could be re-visited as part of the Five-Year Review due October 2012. This BCT decision resulted in eliminating, at least, a three-month extension to the Five-Year Review schedule, and significant costs for additional field work and analyses. The Navy has proposed accelerating the Five-Year Review schedule.

TREASURE ISLAND NAVAL STATION, CA

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I. Significant Issues:

- a. Congressional: None.
- b. High Profile Items: None.
- c. Delays in Environmental Restoration Actions: None. The Navy will prioritize cleanup to facilitate transfer of some parcels.

II. Issues Impacting Transfer: None.

III. Staffing/Funding Issues: None.

IV. MOU Support Updates:

The EPA RPM participates in BCT meetings and reviews documents, as provided. EPA continues to support the Navy's efforts to clean up and transfer the property.

MCAS EL TORO, CA

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I. Significant Issues:

- a. Congressional: None.
- b. High Profile Items: None.

c. Delays in Environmental Restoration Actions: None.

II. **Issues Impacting Transfer:** None.

III. **Staffing/Funding Issues:** None.

IV. **MOU Support Update:**

Finding of Suitability to Transfer #6 for Carve-Outs I-D, I-Q, I-R, II-B, II-K, II-N, II-O, III-B-1, III-B-2, III-E, and III-F Former Marine Corps Air Station El Toro, California: EPA signed this FOST document in February 2011. The purpose of this FOST is to summarize how the requirements and notifications for hazardous substances, petroleum products, and other regulated material within Carve-Outs (COs) I-D, I-Q, I-R, II-B, II-K, II-N, II-O, III-B-1, III-B-2, III-E, and III-F at the former MCAS El Toro have been satisfied by the Navy. Through the BRAC process, the Navy transferred by deed certain former MCAS El Toro real property in 2004. Other real property known as COs were retained by the Navy, pending further investigation and cleanup to support determinations that the property is environmentally suitable for transfer.

Explanation of Significant Differences (ESD) for IRP Sites 2 and 17 at MCAS El Toro: The Navy issued this document for EPA's final review on March 3, 2011. This ESD for IRP Sites 2 and 17 documents the changes to widths of buffer zones which are a component of the Areas Requiring Institutional Controls (ARICs) surrounding the landfills, as described in the April 2000 Final Interim ROD. The ROD prohibits construction of structures within 1,000 feet of the edges of the landfills without prior approval of the Navy and the FFA signatories.

EPA has provided support to the Navy in the following activities which has helped to expedite cleanup and transfer of the site:

- Assisted in providing Community Involvement Coordination for quarterly Restoration Advisory Board meetings to demonstrate support for the Navy's ongoing restoration program at El Toro and encourage public participation;
- Provided technical support through EPA's ADA Office to provide a modeler to review and test the IRWD Model for remediation of TCE at the site, thus helping the Navy and IRWD comply with the existing ESD for groundwater remediation; and
- Supported the Navy's restoration team by participating in meetings on site involving the review of FOST 6, and recommending its approval to DTSC and the Orange County RWQCB, thus expediting the transfer of this property.

ALAMEDA NAVAL AIR STATION, CA

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I. Significant Issues:

- a. Congressional: None.
- b. High Profile Items: The Alameda BRAC Cleanup Team has worked diligently to start the dredging of the contaminated sediment at Installation Restoration Site 17 Seaplane Lagoon. This is the first sediment dredging project at Alameda Point.
- c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer: None.

III. Staffing/Funding Issues: None.

IV. MOU Support Updates:

EPA assisted the Alameda Navy team in identifying the additional areas to be dredged to address the contaminated sediment in the Debris Piles areas. This effort is considered to be part of the Time Critical Removal Action of the Debris Piles at the Seaplane Lagoon, saving the Navy time in cleanup and dollars in remedial process evaluation. The dredging activity for the contaminated sediment in the Debris Piles areas is expected to be completed by May 2011.

EPA assisted the Alameda Navy team in developing a Focused FS outline and a schedule for the ROD Amendment for IR Site 1. A ROD Amendment is in process and is planned to be completed in 2012, addressing the new findings during the pre-design characterization.

MARE ISLAND, CA

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I. Significant Issues:

- a. Congressional: None.
- b. High Profile Items: None.
- c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer: None.

III. Staffing/Funding Issues: Janet Lear replaced Michael Bloom as BEC.

IV. MOU Support Update:

Plans are in preparation for a non-time critical removal action to remove munitions and explosives of concern (MEC) from the south shore and former ordnance manufacturing area beginning this summer.

Several significant removal actions have been completed: excavation of IR Site 17 Paint Manufacturing Area, Former Degreaser Plant outside building 742, and former Paint Waste Area. Completion reports were submitted. Both Sites IR 17 and the former Degreaser Plant have potential vapor intrusion issues; and PCBs in levels of concern still remain in the former Degreaser Plant excavation.

ADAK NAVAL AIR STATION, AK

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I. Significant Issues:

a. Congressional: None.

b. High Profile Items:

- Alaska DEC invoked informal dispute on the Draft Final OU B-2 FS.
- The draft Feasibility Study has undergone a third revision. There remain concerns with that draft due to inappropriate criteria evaluation (inconsistent ratings for cost, implementability evaluation, and inconsistent site descriptions).
- EPA is very concerned with the Navy's failure to prevent their contractor from deviating from the approved work plan for implementing the OU B-1 remedial action.

c. Delays in Environmental Restoration Activities: The three parties to the FFA met on May 2, 2011 to resolve the informal dispute.

II. Issues Impacting Transfer:

Navy has acknowledged that transfer of the property to the Dept. of Interior may not occur if the selected remedy does not provide for unrestricted use/unlimited exposure, as was done for the OU B-1 Sites.

III. Staffing/Funding Issues:

As submitted in the previous BRAC report, work products provided by the Navy still require substantial review and subsequent revisions which has resulted in EPA incurring additional contract expenditures and FTE to review second drafts or wholesale revisions of documents. Greater accountability of documents provided for review should occur within the Navy.

IV. MOU Support Update:

EPA provided input on OU A annual monitoring reports (Institutional Controls, Groundwater, and Landfills). EPA supported the Navy's evaluation and resolution of OU B-1 work deviations to determine if additional work was needed to achieve the Remedial Action Objectives. EPA has continued to provide input on the draft FS for OU B-2.